



# Watton Town Council

## CCTV and Vehicle Tracking Policy

Adopted June 12<sup>th</sup> 2018

Next review date	Date actually reviewed
June 2020	

This policy outlines Watton Town Council's use of CCTV monitoring and vehicle tracking in the workplace. It explains the purpose of CCTV monitoring and vehicle tracking devices, and outlines when and where it takes place, and describes how the information can be used.

### Who does it apply to?

This policy applies to all Watton Town Council employees. All contractors should also familiarise themselves with this policy. Whilst they are not an 'employee' of the Council they should be aware where CCTV monitoring takes place, and be aware that evidence may be discussed with their employer or passed to the police, should a disciplinary or criminal matter arise.

Councillors and Volunteers should also be made aware of where CCTV monitoring takes place and if applicable, where vehicle tracking occurs. Data may be passed to the police where criminal activity is suspected or a criminal matter arises.

### When does it not apply?

This policy does not apply to members of the public or visitors.

### What are the main points?

#### Use of CCTV

1. Cameras are installed in council buildings for preventing and detecting crime or acts of equivalent misconduct and for health and safety reasons such as ensuring our workforce is safe. The council will ensure that all cameras are set up in a way that makes sure that there is minimal intrusion of staff privacy, and that any intrusion is fully justified.
2. In areas of deployment of CCTV, signs will be displayed prominently to inform employees and visitors that CCTV is in use and its purpose. They will also include the information that Watton Town Council is operating the system along with a contact telephone number for any queries. This ensures that staff are fully aware that they are potentially subject to

surveillance and can take appropriate steps to limit the impact of the CCTV with regard to their privacy within the workplace.

### **CCTV is installed at Wayland Hall where a stand-alone system is installed**

3. The cameras cover entrances, exits and external areas; and in some cases they will also cover public or communal areas. The CCTV cameras are not continuously monitored, and the CCTV cameras record images only and not sound.

If new CCTV monitoring is installed all affected staff will be fully informed, ensuring that they have information about the purpose of the monitoring and how the information will be used.

### **Evidence from CCTV footage**

4. CCTV evidence can be used where the Council can show that it was acting fairly and lawfully. CCTV recordings will only be accessed where the Council has a reasonable belief that there is suspected criminal activity, suspected gross misconduct, Health and Safety issues or to protect the council against fraudulent damage claims, or when a police crime reference number has been issued.

5. CCTV footage may be used in disciplinary proceedings if the council is investigating a serious incident, such as criminal activity, gross misconduct, behaviour which puts themselves and others at risk (H&S), or discloses activities that an employer could not reasonably be expected to ignore.

6. Use of CCTV data will only be considered as evidence following consultation with the Town Council HR Committee, in order to establish whether it is an essential part of the investigation.

7. Retrieval of CCTV images should be undertaken only by the Clerk, Deputy Clerk or members of the HR Committee.

8. Requests to view CCTV data should be made in writing addressed to the Town Council and clear records (time/date/reason) of why the data was viewed should be kept.

9. Where CCTV evidence forms part of a disciplinary case against an individual, that individual will be shown a copy of the images, and will be given the opportunity to respond to them, as part of the disciplinary procedure. Copies will only be provided where there is adequate protection for other employees or members of the public who may also appear in the recording.

10. The CCTV footage will only be disclosed to those who need access to it as part of the disciplinary process.

11. Where CCTV exonerates employees of any wrong doing, the images will only be retained until the matter is concluded and the business feels it is no longer necessary to retain the images.

12. Where there is evidence of criminal activity, recordings may be provided to the police or other enforcement agencies, if requested. Any such disclosure would be made in accordance with the Data Protection Act.

## **Storage of CCTV footage**

13. Images from CCTV footage will be securely stored and only authorised personnel will have access to them. The images will be retained for the designated time of the system after which they will be automatically overwritten. (Typically 7-30 days)

14. In an investigation, in accordance with data protection principles, images will only be retained long enough for the incident to be investigated and concluded in respect of the Council's internal processes and/or at the end of any legal or other process which requires the data to be retained.

## **Vehicle tracking devices**

15. The Council owned van is fitted with a tracking device.

16. The tracking system can record or transmit information such as the location of a vehicle, the distance it has covered and information about the users driving habits.

17. Tracking data may be used to protect the council against fraudulent damage claims, and as a management tool.

18. Should there be a reasonable belief that there are unusual patterns of activity or non-activity, the tracking device data may be used to investigate the reason for this.

## **Evidence from Vehicle tracking devices**

19. Any evidence used from the tracking device in the investigation into unusual patterns of activity/non activity may be produced as evidence in any subsequent disciplinary process, where appropriate, if the data shows activities by employees, that an employer could not reasonably be expected to ignore. (Refer to Evidence from CCTV footage)

20. Use of vehicle tracking data will only be considered as evidence following consultation with the HR Committee, in order to establish whether it is an essential part of the investigation.

21. Where access is not part of a daily management tool, requests to view vehicle tracking data should be made to the Town Council in writing and clear records (time/date/reason) of why the data was viewed should be kept.

22. Where vehicle tracking evidence forms part of a disciplinary against an individual they will be shown a copy of the tracking report, and will be given the opportunity to respond to it, as part of the disciplinary procedure. Copies will only be provided where there is adequate protection for other employees shown in the data.

23. The vehicle tracking information will only be disclosed to those employees who need access to it as part of the disciplinary process.

24. Where there is evidence of criminal activity, data may be provided to the police or other enforcement agencies, if requested. Any such disclosure would be made in accordance with the Data Protection Act.

25. Generally tracking is undertaken as a lone working risk assessment tool.

26. When new methods or use of vehicle tracking information are introduced all affected staff will be fully informed, ensuring that they have information about the purpose of the monitoring and how the information will be used.

### **Other monitoring**

27. Please refer to the Communications Policy and the Social Media Policy for information regarding monitoring of email and internet usage.

### **Roles and responsibilities**

#### **HR Committee responsibilities**

28. HR Committee to ensure that appropriate team members are trained in the use and retrieval of CCTV.

29. HR Committee to ensure staff are trained in the use of data retrieval from vehicle tracking devices.

30. HR Committee to liaise with Clerk where CCTV or other recorded data evidence is requested.

31. HR Committee/ Council to consider alternative methods of reaching same end result without CCTV.

32. HR Committee to ensure data protection principles are followed and that CCTV recordings are only disclosed to the people who need to have access to them.

#### **Clerk's Responsibilities**

33. Clerk to ensure data protection principles are followed and that CCTV recordings are only disclosed to the people who need to have access to them.

34. Clerk to ensure correct signage in place alerting employees and public to where CCTV monitoring is in place.

35. Clerk to ensure data protection principles are followed and that CCTV recordings and vehicle tracking data is only disclosed to the people who need to have access to it.

36. Clerk to ensure town van has the appropriate signage/stickers showing it has tracking device installed.

37. Clerk to ensure data protection principles are followed and that vehicle tracking data is only disclosed to the people who need to have access to it.

38. When new methods of CCTV monitoring or tracking are introduced Clerk to ensure that relevant affected staff are fully informed, ensuring that they have information about the purpose of the monitoring and how the information will be used.

39. Clerk to ensure, where appropriate, that a privacy impact assessment has been carried out prior to implementation of new monitoring systems.

40. Clerk to regularly remind staff that CCTV or tracking devices are in operation.

41. When intending to use recorded data for disciplinary purposes Clerk to ensure that advice has been sought as to whether this is appropriate and required.

42. Clerk to ensure clear records are kept showing when data has been viewed and for what purpose (requests to view must be made in writing).

**Employee responsibilities**

43. Employees to ensure they have read and understood the policy.